

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Nancy Goodman and Jacqueline Peiffer, Plaintiffs, v. J.P. Morgan Investment Management, Inc., et al., Defendants.	Case No.: 2:14-CV-414 Judge Frost Magistrate Judge King
CAMPBELL FAMILY TRUST, et al., Plaintiffs, v. J.P. MORGAN INVESTMENT MANAGEMENT, INC., et al., Defendants.	Civil No. 2:15-CV-2923 Judge Frost Magistrate Judge King

DEFENDANTS' RESPONSE TO
PLAINTIFFS' MOTION TO CONSOLIDATE

Defendants J.P. Morgan Investment Management, Inc., JP Morgan Funds Management, Inc. and JPMorgan Chase Bank, N.A. hereby submit their response to Plaintiffs' motion to consolidate Case No. 2:14-CV-414 ("*Goodman*") and Case No. 2:15-CV-2923 ("*Campbell*").

Defendants are not opposed to consolidation of *Goodman* and *Campbell*, provided that the consolidated case schedule does not substantially delay *Goodman*, which has been pending since May 5, 2014. Toward that end, Defendants have had discussions with Plaintiffs in an effort to reach an agreed upon consolidated case schedule.

Plaintiffs and Defendants have agreed in principal on the key deadlines in the proposed case schedule – *i.e.* fact discovery cut-off, expert witness disclosure deadlines, and dispositive motion deadline – however, they are still attempting to reach agreement on certain interim dates and related discovery issues.

Given these circumstances, Defendants propose that the parties submit a new Rule 26(f) Report setting forth a proposed consolidated case schedule for *Goodman and Campbell*, to be followed by a preliminary pretrial conference to address any remaining disagreements or other issues the Court would like to address. Plaintiffs have indicated they agree with this proposed approach. The parties should be able to submit a Rule 26(f) Report by no later than Friday, January 15, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of January, 2016, I have caused the foregoing Response to Plaintiffs' Motion to Consolidate to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing ("NEF") to the following:

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